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Attorneys for Defendant
LG. PHILIPS LCD AMERICA, INC.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Candace Rowlette, a Florida resident; and
Michael Francis Ayers, a Massachusetts
resident, on behalf of themselves and all others
similarly situated,

Plaintiff,

vs.

LG. Philips LCD Co. Ltd., LG. Philips LCD
America, Inc.; Samsung Electronics Co. Ltd.;
NEC Corporation; NEC Electronics America,
Inc.; NEC LCD Technologies Ltd.; Hitachi
Ltd; Hitachi Displays, Ltd.; Hitachi Electronics
Devices (USA), Inc.; Hitachi America Ltd.;
International Display Technology Co., Ltd.;
International Display Technology USA Inc;
Sanyo Epson Imaging Devices Corporation;
Sharp Corporation; Sharp Electronics
Corporation; Toshiba Corporation; Toshiba
Matsushita Display Technology Co. Ltd.; AU
Optronics Corp.; AU Optronics Corporation
America; Chi Mei Optoelectronics; Chi Mei
Optoelectronics USA, Inc.; Chunghwa Picture
Tubes, Ltd.; Hannstar Display Corporation,

Defendants.

CASE NO. C 07-00039 (SI)

**STIPULATION FOR EXTENSION OF
TIME**

Honorable Susan Illston

1 WHEREAS plaintiff filed a complaint in the above-captioned case on or about
2 January 4, 2007;

3 WHEREAS plaintiff alleges antitrust violations by manufacturers of Liquid
4 Crystal Display ("LCD") products;

5 WHEREAS more than fifteen complaints have been filed to date in federal district
6 courts throughout the United States by plaintiffs purporting to bringing class actions on behalf of
7 indirect purchasers alleging antitrust violations by manufacturers of LCD products (collectively,
8 "the LCD Cases");

9 WHEREAS there is a motion pending before the Judicial Panel on Multidistrict
10 Litigation to transfer the LCD Cases to the Northern District of California for coordinated or
11 consolidated pretrial proceedings pursuant to 28 U.S.C. § 1407;

12 WHEREAS plaintiff anticipates the possibility of Consolidated Amended
13 Complaints in the LCD Cases;

14 WHEREAS plaintiff and LG Philips LCD America, Inc. ("LPL America") have
15 agreed that an orderly schedule for any response to the pleadings in the LCD Cases would be
16 more efficient for the parties and for the Court;

17 WHEREAS plaintiff agrees that the deadline for LPL America to respond to the
18 Complaint shall be extended until the earlier of the following two dates: (1) forty-five days after
19 the filing of a Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after
20 plaintiff provides written notice to LPL America that he does not intend to file a Consolidated
21 Amended Complaint, provided that such notice may be given only after the initial case
22 management conference in the MDL transferee court in this case;

23 WHEREAS plaintiff further agrees that this extension is available, without further
24 stipulation with counsel for plaintiff, to all named defendants who notify plaintiff in writing of
25 their intention to join this extension;

26 WHEREAS this Stipulation does not constitute a waiver by LPL America or any
27 defendant of any defense, including but not limited to the defenses of lack of personal or subject
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1 matter jurisdiction, insufficiency of process, insufficiency of service of process, or improper
2 venue.

3 PLAINTIFF AND DEFENDANT LPL AMERICA, BY AND THROUGH THEIR
4 RESPECTIVE COUNSEL OF RECORD, HEREBY STIPULATE AS FOLLOWS:

5 1. The deadline for LPL America to respond to the Complaint shall be
6 extended until the earlier of the following two dates (1) forty-five days after the filing of a
7 Consolidated Amended Complaint in the LCD Cases; or (2) forty-five days after the plaintiff
8 provides written notice that he does not intend to file a Consolidated Amended Complaint,
9 provided that such notice may be given only after the initial case management conference in the
10 MDL transferee court in this case.

11 2. This extension is available, without further stipulation with counsel for
12 plaintiff or further order of the Court, to all named defendants who notify plaintiff in writing of
13 their intention to join this extension.

14 IT IS SO STIPULATED.

15
16 DATED: January 12, 2007

Respectfully submitted,

17 MUNGER, TOLLES & OLSON LLP

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19 By: /s/ Jerome C. Roth
20 JEROME C. ROTH
21 Attorneys for Defendant
22 LG.PHILIPS LCD AMERICA, INC.

23 Of Counsel:

24 Michael R. Lazerwitz
25 Jeremy J. Calsyn
26 Lee F. Berger
27 CLEARY GOTTLIEB STEEN &
28 HAMILTON LLP
2000 Pennsylvania Avenue, NW
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1 DATED: January 12, 2007

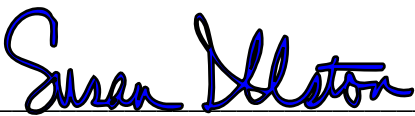
FURTH LEHMANN & GRANT LLP

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3 By: /s/ Jon T. King

4 MICHAEL P. LEHMANN
5 THOMAS P. DOVE
6 CHRISTOPHER L. LEBSOCK
7 JON T. KING
8 Attorneys for Plaintiffs
9 CANDACE ROWLETTE and
10 MICHAEL FRANCIS AYERS

11 PURSUANT TO STIPULATION, IT IS SO
12 ORDERED:

13 Dated: _____



Honorable Susan Illston
Judge of the United States District Court

14 CERTIFICATION

15 I, Jerome C. Roth, am the ECF User whose identification and password are being used to file this
16 Stipulation For Extension Of Time. In compliance with General Order 45.X.B, I hereby attest
17 that Jon T. King has concurred in this filing.
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